

**Exhibit A**

**Phoenix Packaging Operations, LLC  
4800 Lina Lane  
Dublin, Virginia 24084**

Dean Dairy Holdings, LLC  
Suiza Dairy Group, LLC  
2711 North Haskell Avenue  
Suite 3400  
Dallas, Texas 75204  
Attn: Senior Procurement Officer

Daniel Meyer, Esq.  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, New York 10017

William R. Greendyke, Esq.  
Norton Rose Fulbright US LLP  
1301 McKinney Street  
Suite 5100  
Houston, Texas 77010-3095

***Via Overnight Delivery***

Re: Reclamation Demand to Dean Dairy Holdings, LLC and Suiza Dairy Group, LLC

Dear Sir or Madam:

In accordance with section 2-702 of the Uniform Commercial Code and section 546(c) of Title 11 of Chapter 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), this letter constitutes a notice of demand for the return of all goods received by Dean Dairy Holdings, LLC and Suiza Dairy Group, LLC from Phoenix Packaging Operations, LLC on or after September 28, 2019, as identified on the attached Schedule (the “**Goods**”). The Schedule, which we reserve the right to modify after further investigation, specifically includes, but does not limit, the Goods subject to our reclamation claim.

Further, we demand that the Goods currently in your possession be protected and segregated by you and not be used for any purpose whatsoever, except by agreement of the parties or following notice and a hearing by the Bankruptcy Court or other court of competent jurisdiction. You may not sell, dissipate, or commingle the Goods with any other goods.

This reclamation demand is made without prejudice to any other rights or remedies available to us, at law or in equity, including, but not limited to, our right to an administrative expense claim under section 503(b)(9) of the Bankruptcy Code for all goods received by you on or after 20 days before the

commencement of the bankruptcy cases.

Please contact the undersigned immediately for instructions regarding the return of the Goods. If you do not authorize the return of the Goods promptly, we will take further appropriate measures.

Sincerely,

Ana Bravo / w/permission DNE

Phoenix Packaging Operations, LLC

Name: Ana Bravo

Title: General Counsel

**SCHEDULE**

*See attached.*